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UNITED STATES DISTRICT COURT OF NEVADA

SAMANTHA ALEXANDRIA HARPER-
ALVAREZ, an individual;

Plaintiff,

v.

GEICO ADVANTAGE INSURANCE
COMPANY; DOES 1-X, and ROE
CORPORATIONS I - X, inclusive,

Defendants.

CASE NO. 2:25-CV-00160-RFB-MDC

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH
LR 26-1(b)**

The parties submit their proposed discovery plan and scheduling order pursuant to LR 26-1.

Meeting: Pursuant to FRCP 26(f) and LR-26-1(a), a meeting was held on February 20, 2025, and was attended by Christopher L. Benner, Esq., counsel for Plaintiff, and Jonathan Carlson, counsel for Defendant.

1. Pre-Discovery Disclosures: Pursuant to FRCP Rule 26(a)(1), the parties will make their pre-discovery disclosures, including but not limited to any computation(s) of damages required pursuant to FRCP 26(a)(1)(A)(iii), by **Thursday, March 6, 2025**.

2. Areas of Discovery: Discovery should include, but not be limited to: all claims and defenses allowed pursuant to the Federal Rules of Civil Procedure.

3. Discovery Plan: Pursuant to LR 26-1(b)(1), the 180 days of discovery runs from the first time the first defendant answers or otherwise appears. Here, Defendant appeared

1 on January 27, 2025, by filing a Notice of Removal [ECF No. 1]. The discovery deadlines herein
2 have been calculated from that date.

3 4. **Discovery Cut-Off Dates:** The parties propose that discovery must be
4 commenced and completed no later than **Monday, July 28 2025¹**, (182 days after the defendants
5 appeared), and be conducted as follows:

6 A. **Amending the Pleadings and Adding Parties:** The parties shall have until
7 **Tuesday April 29, 2025**, to file any motions to amend the pleadings to add parties, ninety (90)
8 days prior to the discovery cut-off date, pursuant to LR 26-1(b)(2).

9 B. **FRCP 26(a)(2) Disclosures of Experts:** Expert witness disclosures shall
10 be made on or before **Thursday May 29, 2025**, sixty (60) days prior to the discovery cut-off.
11 Disclosures regarding rebuttal experts shall be made on or before **Monday, June 30, 2025²**,
12 thirty-two (32) days after the initial disclosures of experts. The requirements of FRCP
13 26(a)(2)(B) shall apply to any such disclosures.

14 C. **Dispositive Motions:** The parties shall have until **Wednesday, August 27,**
15 **2025**, to file dispositive motions, thirty (30) days after the discovery cut-off. In the event
16 the discovery cut-off is extended, the deadlines for filing dispositive motions automatically
17 will be extended until thirty (30) days after the new discovery cut-off date.

18 D. **Pre-Trial Order:** The parties will prepare a consolidated pre-trial order on
19 or before **Friday, September 26, 2025**, which is thirty (30) days after the date set for filing
20 dispositive motions in the case. This deadline will be suspended if dispositive motions are
21 timely filed until thirty (30) days after the decision of the dispositive motions or until further order
22

23
24
25 ¹ The date occurring 180 days following the expert disclosure cut-off date falls on Saturday, July 26,
26 2025, and as such, this deadline has been moved to the next judicial day.

27 ² The date occurring 30 days following the expert designation deadline falls on Saturday, June 28, 2025,
28 and as such, this deadline has been moved to the next judicial day.

1 of the court. The disclosure required FRCP Rule 26(a)(3) and objections thereto, shall be made
2 in the pre-trial order.

3 E. **Court Conferences:** If the court has questions regarding the dates
4 Proposed by the parties, the parties request a conference with the court before entry of the
5 scheduling order.

6 F. **Extensions or Modifications of the Discovery Plan and Scheduling Order:**
7 LR 26-3 governs modifications or extensions of this discovery plan and scheduling order. Any
8 stipulation or motion to extend a deadline set forth in the discovery plan and scheduling order
9 must be made not later than twenty-one (21) days before the subject deadline. Any stipulation or
10 motion to extend the discovery cut-off period must be made no later than **Monday, July 7, 2025**,
11 twenty-one (21) days before the discovery cut-off date.

12
13 **5. Other Items:**

14 A. **Format of Discovery:** Pursuant to the electronic discovery amendments
15 to the Federal Rules of Civil Procedure effective December 1, 2006, the parties addressed the e-
16 discovery issues pertaining to the format of discovery at the Rule 26(f) conference. The parties do
17 not anticipate discovery of native files or metadata at this time, but each party reserves the right to
18 request such electronic data as discovery progresses. The parties discussed the potential discovery
19 of native files or metadata and inspection of devices used to store information electronically.
20 Each party reserves the right to request electronic data as discovery progresses.

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22 B. **Alternative Dispute Resolution:** The parties hereby certify that they met
23 and conferred about the possibility of using alternative dispute-resolution processes including
24 mediation, arbitration, and if applicable, early neutral evaluation (collectively, **ADR**) and
25 determined that ADR is not a viable option at this time.

26 C. **Alternative Forms of Case Disposition:** The parties hereby certify
27 they considered Alternative Disposition means and do not consent to either at this time.
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